

UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

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No. 24-3006  
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UNITED STATES OF AMERICA,

APPELLEE,

v.

PETER K. NAVARRO,

APPELLEE.

**APPELLANT’S SECOND UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE APPELLANT’S PRINCIPAL BRIEF AND APPENDIX**

Appellant Dr. Peter K. Navarro, through the undersigned counsel, respectfully moves this Court for an additional fourteen (14) day extension of time to file his principal brief and appendix, pursuant to Federal Rules of Appellate Procedure 26(b) and 27, and Circuit Rules 27(h) and 28(e). The brief is currently due on June 27, 2024, meaning the extension would result in a new deadline of July 11, 2024. The undersigned has conferred with counsel for Appellee United States of America, who does not oppose the requested extension.

Good cause exists to grant this motion, although it is being filed within seven (7) days before the brief is due. *See* Circuit Rule 28(e). First, the motion is unopposed by the United States. Second, yesterday, June 23, 2024, counsel attempted to visit with Appellant but was denied a legal visit. Since the day of his self-surrender, counsel for Appellant had been advised that legal visits could only

occur on weekends due to staffing shortages at Federal Correctional Institution Miami. Indeed, representatives of the facility advised, in writing, on April 4, 2024, that visits by counsel were permitted only on Saturdays and Sundays. Yesterday, however, counsel was advised by the Lieutenant and officer-in-command that legal visits are permitted only during weekdays. Although permitted a social visit, counsel was unable to review with Appellant the draft of his principal brief. Accordingly, an additional brief extension is required to permit counsel to meet with Appellant to review his principal brief with him. This is Appellant's first request for an extension, and the undersigned does not anticipate requesting another.

Accordingly, for the reasons stated herein, Dr. Navarro respectfully requests that this motion be granted and that the deadline to file his principal brief and appendix be extended to July 11, 2024.

Dated: June 24, 2024      Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

Stanley E. Woodward, Jr. (D.C. Bar No. 997320)

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### **CERTIFICATE OF COMPLIANCE**

I hereby certify, pursuant to Fed. R. App. P. 27(d)(2)(A) that the foregoing motion complies with the type-volume limitation because it contains 294 words and therefore, not more than 5,200 words. I further certify that this motion, pursuant to Fed. R. App. P. 27(d)(1)(E) complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the typeface style requirements of Fed. R. App. P. 32(a)(6) because the brief was prepared in 14-point Times New Roman font using Microsoft Word.

\_\_\_\_\_/s/  
Stanley Woodward Jr.

### **CERTIFICATE OF SERVICE**

I hereby certify, pursuant to Fed. R. App. P. 25(c), that on June 24, 2024, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification to the attorneys of record in this matter who are registered with the Court's CM/ECF system.

\_\_\_\_\_/s/  
Stanley Woodward Jr.